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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

24cr236 Judge Wood

Under Seal

Magistrate Judge Valdez

Cat. 3

Case No. 24 CR 236

ARDARIES HARRIS, JORDAN FOX, ROOSEVELT VEAL, and XAVIER HARRIS

v.

Violations: Title 18, United States Code, Sections 1951(a), 924(c)(1)(A), and 924(c)(1)(B)(ii)

COUNT ONE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

Beginning in or around August 2023, and continuing until on or about
May 11, 2024, in the Northern District of Illinois, Eastern Division,

ARDARIES HARRIS, JORDAN FOX, ROOSEVELT VEAL, and XAVIER HARRIS,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury to obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), in violation of Title 18, United States Code, Section 1951(a), that is, to unlawfully take and obtain United States currency and property from the person and in the presence of employees of several businesses against those employees' will, by means of actual and threatened

force, violence, and fear of injury to those employees, in violation of Title 18, United States Code, Section 1951(a).

- 2. It was part of the conspiracy that defendants ARDARIES HARRIS, FOX, VEAL, and XAVIER HARRIS, and others known and unknown to the Grand Jury, agreed to rob various liquor stores, convenience stores, and bars, in the Northern District of Illinois.
- 3. It was further part of the conspiracy that defendants ARDARIES HARRIS, FOX, VEAL, and XAVIER HARRIS and others known and unknown to the Grand Jury, obtained cars, including cars that had been stolen, to use in the robberies.
- 4. It was further part of the conspiracy that defendants ARDARIES HARRIS, FOX, VEAL, and XAVIER HARRIS, and others known and unknown to the Grand Jury, concealed their identities during the robberies by wearing hoods, masks, gloves, and other items.
- 5. It was further part of the conspiracy that defendants ARDARIES HARRIS, FOX, VEAL, and XAVIER HARRIS, and others known and unknown to the Grand Jury, obtained, possessed, brandished, and discharged firearms in connection with the robberies.
- 6. It was further part of the conspiracy that defendants ARDARIES HARRIS, FOX, VEAL, and XAVIER HARRIS, and others known and unknown to the Grand Jury, took United States currency, Mexican currency, and Canadian currency

from the employees and customers of the businesses and from the businesses by force and threat of force, violence, and fear of injury to those employees and customers.

- 7. It was further part of the conspiracy that defendants FOX, ARDARIES HARRIS, and XAVIER HARRIS, and others known and unknown to the Grand Jury, sought to avoid detection by law enforcement of the May 9, 2024, attempted robbery of Basil Food and Liquor, located at 7446 North Western Avenue in Chicago, by concealing the source of FOX's gunshot wound that was sustained during the attempted robbery and by cleaning the getaway vehicle and removing its license plate.
 - 8. It was further part of the conspiracy that:
- a. On or about August 24, 2023, defendant FOX and another coconspirator robbed Ace's Liquor and Tap, located at 4437 West Armitage in Chicago, as charged in Count Two of this Indictment.
- b. On or about November 24, 2023, defendant VEAL and another coconspirator attempted to rob Super Saving Food, located at 4424 West Belmont Avenue in Chicago.
- c. On or about January 10, 2024, defendants FOX, VEAL, and another coconspirator robbed A&R Food Mart, located at 5952 West Grand Avenue in Chicago, as charged in Count Three of this Indictment.
- d. On or about January 11, 2024, defendants FOX, ARDARIES HARRIS, and another coconspirator robbed Central Extra Value Food and Liquor, located at 2914 North Central Avenue in Chicago, as charged in Count Five of this Indictment.

- e. On or about January 13, 2024, defendants ARDARIES HARRIS, FOX, and another coconspirator robbed Buchanas Food & Liquor, located at 1834 West 47th Street in Chicago.
- f. On or about January 15, 2024, defendants ARDARIES HARRIS, FOX, VEAL, and another coconspirator robbed Mr. P Beverage Depot, located at 2006 West Division Street, in Chicago, as charged in Count Seven of this Indictment.
- g. On or about January 15, 2024, defendants ARDARIES HARRIS, FOX, VEAL, and another coconspirator robbed Before You Go Liquor, located at 1917 West Fullerton Avenue, in Chicago, as charged in Count Nine of this Indictment.
- h. On or about January 15, 2024, defendants ARDARIES HARRIS, FOX, VEAL, and another coconspirator robbed Clybourn Market, located at 2807 North Clybourn Avenue, in Chicago, as charged in Count Eleven of this Indictment.
- i. On or about May 3, 2024, defendants FOX, VEAL, and ARDARIES HARRIS attempted to rob Humboldt Haus Liquor, located at 2958 West North Avenue in Chicago, as charged in Count Thirteen of this Indictment.
- j. On or about May 3, 2024, defendants FOX, VEAL, and ARDARIES HARRIS robbed Gladstone Food Mart, located at 5789 North Milwaukee Avenue in Chicago, as charged in Count Fourteen of this Indictment.
- k. On or about May 4, 2024, defendants FOX, VEAL, and ARDARIES HARRIS robbed the Irish Nobleman Pub, located at 1367 West Erie Street in Chicago, as charged in Count Sixteen of this Indictment.

- l. On or about May 7, 2024, defendants XAVIER HARRIS, ARDARIES HARRIS, and FOX robbed Buchanas Food & Liquor, located at 1834 West 47th Street in Chicago, as charged in Count Eighteen of this Indictment.
- m. On or about May 7, 2024, defendants XAVIER HARRIS, ARDARIES HARRIS, and FOX robbed El Trebol Liquors and Bar, located at 1135 West 18th Street in Chicago, as charged in Count Twenty of this Indictment.
- n. On or about May 7, 2024, defendants XAVIER HARRIS, ARDARIES HARRIS, and FOX robbed Community Food and Liquor, located at 5530 North Milwaukee Avenue in Chicago, as charged in Count Twenty-Two of this Indictment.
- o. On or about May 9, 2024, defendants FOX and ARDARIES HARRIS attempted to rob Basil Food & Liquor, located at 7446 North Western Avenue in Chicago.
- 9. It was further part of the conspiracy that defendants ARDARIES HARRIS, FOX, VEAL, and XAVIER HARRIS, and others known and unknown to the grand jury, obtained more than \$280,000 in United States currency through the robberies.
- 10. It was further part of the conspiracy that defendants ARDARIES HARRIS, FOX, VEAL, and XAVIER HARRIS, and others known and unknown to the grand jury, would and did conceal and hide, and caused to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy.

COUNT TWO

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about August 24, 2023, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORDAN FOX,

defendant herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendant did unlawfully take and obtain United States currency from the person and in the presence of an employee of Ace's Liquor and Tap, located at 4437 West Armitage Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT THREE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 10, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of A&R Food Mart, located at 5952 West Grand Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT FOUR

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 10, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Three of this Indictment;

COUNT FIVE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 11, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORDAN FOX, and ARDARIES HARRIS,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Central Extra Value Food and Liquor, located at 2914 North Central Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT SIX

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 11, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORDAN FOX, and ARDARIES HARRIS,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Five of this Indictment;

COUNT SEVEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Mr. P Beverage Depot, located at 2006 West Division Street, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT EIGHT

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Seven of this Indictment;

COUNT NINE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Before You Go Liquor, located at 1917 West Fullerton Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT TEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Nine of this Indictment;

COUNT ELEVEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Clybourn Market, located at 2807 North Clybourn Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT TWELVE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eleven of this Indictment;

COUNT THIRTEEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 3, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully attempt to take and obtain United States currency from the person and in the presence of an employee of Humboldt Haus Liquor, located at 2958 West North Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT FOURTEEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 3, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Gladstone Food Mart, located at 5789 North Milwaukee Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT FIFTEEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 3, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Fourteen of this Indictment;

COUNT SIXTEEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 4, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of the Irish Nobleman Pub, located at 1367 West Erie Street, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT SEVENTEEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 4, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL

defendants herein, did use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Sixteen of this Indictment;

The grand jury further alleges that a firearm possessed was a machinegun; In violation of Title 18, United States Code, Section 924(c)(1)(A) and (B)(ii).

COUNT EIGHTEEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 7, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and XAVIER HARRIS,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Buchanas Food & Liquor, located at 1834 West 47th Street, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT NINETEEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 7, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and XAVIER HARRIS,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eighteen of this Indictment;

COUNT TWENTY

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 7, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and XAVIER HARRIS,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of El Trebol Liquors and Bar, located at 1135 West 18th Street, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT TWENTY-ONE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 7, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and XAVIER HARRIS,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twenty of this Indictment;

COUNT TWENTY-TWO

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 7, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and XAVIER HARRIS,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Community Food and Liquor, located at 5530 North Milwaukee Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT TWENTY-THREE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about May 7, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and XAVIER HARRIS,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twenty-Two of this Indictment;

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2023 GRAND JURY further alleges:

- 1. The allegations contained in this Indictment are incorporated here by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).
- 2. As a result of their violations of Title 18, United States Code, Sections 924(c)(1)(A) and 1951(a), as alleged in the foregoing Indictment,

ARDARIES HARRIS, JORDAN FOX, ROOSEVELT VEAL, and XAVIER HARRIS.

defendants herein, shall forfeit to the United States, pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property involved in the charged offense.

- 3. The interest of the defendants subject to forfeiture pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), includes but is not limited to property seized on or about January 22, 2024 and on or about May 11, 2024, including:
 - a. Approximately \$11,300 in United States currency;
 - b. Approximately \$1,300 in Mexican currency;
 - c. Approximately \$5 in Canadian currency;
 - d. A chrome Smith & Wesson .38 Special Revolver, bearing serial number AW279511 and associated ammunition;

- e. A Glock 19 Gen 4 pistol bearing serial number ZGA101 and associated ammunition;
- f. A Glock 48 pistol bearing serial number BYGK813 and associated ammunition;
- g. An Intratec AB10 pistol bearing an obliterated serial number and associated ammunition;
- h. A Savage Stevens 940E shotgun bearing serial number P132206 and associated ammunition;
- i. Three machinegun conversion devices, also known as switches;
- j. A 3D printed Glock-style pistol receiver and associated ammunition;
- k. A Savage Stevens 84 rifle and associated ammunition;
- 1. One box of Ammo Incorporated 9mm ammunition;
- m. One box of CCI-Blazer 9mm ammunition;
- n. One box of TulAmmo .45 caliber ammunition;
- o. One box of Remington .40 caliber Smith & Wesson ammunition;
- p. One box of Remington 9mm ammunition;
- q. One box of Remington 0.22 caliber ammunition;
- r. One box of Hornady-American Gunner 10mm ammunition;
- s. One box of Hornady .40 caliber Smith & Wesson ammunition;
- t. One box of Herter's 9mm ammunition;
- u. One box of Sellier & Bellot 9mm ammunition;
- v. One box of Sig Sauer 9mm ammunition;
- w. One box of American Eagle .40 caliber Smith & Wesson ammunition;
- x. One box of Sears 20 gauge ammunition; and

у.	One box of Frontier .223 caliber ammunition
	A TRUE BILL:
	FOREPERSON
ACTING III	NITED STATES ATTORNEY